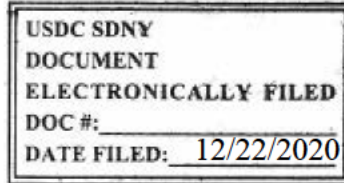




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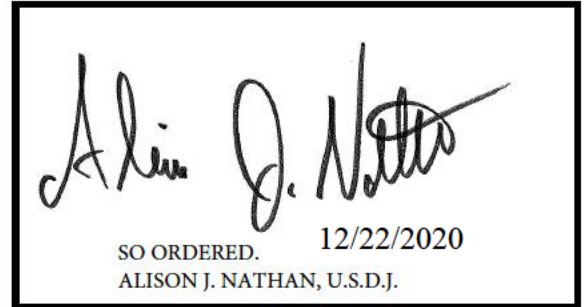


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December 21, 2020

**Via ECF**

Hon. Alison J. Nathan  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007



**Re: Raven Diaz v. Marriott International, Inc.  
Docket No. 19-cv-3865 (AJN) (KNF)**

Dear Judge Nathan:

SO ORDERED.

This firm represents Defendant Marriott International, Inc. in the above-referenced matter commenced by *pro se* Plaintiff Raven Diaz. We write pursuant to Your Honor's Individual Practices in Civil Cases and with Plaintiff's consent to request a thirty (30) day extension of time for the parties to file their motions for summary judgment, making the deadline January 25, 2021. The parties' current deadline is December 24, 2020. This is the parties' first request for an extension of time to move for summary judgment.

Defendant makes this request for several reasons. First, due to the recent uptick in COVID-19 cases, which has hit Defendant's counsel's office particularly hard, Defendant's counsel's office is currently closed and several staff members have confirmed cases. Second, the deadline to complete fact discovery ended on November 24, 2020. On that day, Plaintiff served supplemental discovery requests, for which Defendant is providing responses. Third, due to the COVID-19 pandemic there was significant delay from the court reporting service delivering the transcripts from the depositions. For these reasons, Defendant respectfully requests the above-referenced thirty (30) day extension of time for the parties to file motions for summary judgment.

We thank the Court for its attention to this matter.

Sincerely,  
s/ Jeffrey Douglas  
JEFFREY G. DOUGLAS

JGD

Cc: Plaintiff (via email [ravendprose1999@gmail.com](mailto:ravendprose1999@gmail.com))